



Office of the General Counsel

April 25, 2008

7-21-2008

Harry R. Steinmetz (3HS62)  
U. S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103

ORIGINAL

RE: CERCLA 104(e) Letter Requiring Submission of Information,  
Safety Light Corporation Site

Dear Mr. Steinmetz:

This will acknowledge receipt of the letter addressed to Vanderbilt University from Laura B. Janson, Chief of the Cost Recovery Branch, received by Vanderbilt on April 15, 2008, a copy of which is attached for your reference. In her letter, Ms. Janson requests that Vanderbilt respond to a request for information originally submitted to Vanderbilt in July 2005. Vanderbilt regrets that no response appears to have been provided in 2005. However, in response to the later inquiry, Vanderbilt submits the attached report that was prepared by its Office of Environmental Health and Safety following an extensive search and review of all known records maintained by the University that relate to the disposal of hazardous substances, pollutants or contaminants.

As noted in the response to Item 1 of the original request for information, Vanderbilt has found no record indicating the existence of any business relationship between Vanderbilt and Safety Light Corporation. The remainder of the report responds to the balance of the questions raised by the EPA and details the process followed by Vanderbilt's Office of Environmental Health and Safety in gathering the information upon which this report was prepared.

If you have any questions regarding this report, please do not hesitate to contact Mr. Robert Wheaton, Director of the Office of Environmental Health and Safety at (615)343-0758.

Sincerely,

David Williams II

Vice Chancellor and General Counsel

DW:jc

cc: Robert Wheaton, Director, Office of Environmental Health and Safety

Enclosure

1. *Describe in detail the business relationship between Vanderbilt and Safety Light.*

We have found no record indicating the existence of a business relationship between Vanderbilt and Safety Light.

2. *Did Vanderbilt ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium. Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site?*

We reviewed archived records contained in folders or binders described as:

|   |             |
|---|-------------|
| Source and SNM Correspondence           | 1956 – 1965 |
| Correspondence                          | 1956 – 1965 |
| Rad Dept Invoices from Vanderbilt       | 1956 – 1958 |
| Waste Disposal Shipment Records         | 1960 – 1989 |
| AEC license cancellation records        | 1963        |
| Leak tests                              | 1965 – 1969 |
| Old waste shipment                      | 1966        |
| Radioactive Waste Disposal Forms        | 1966 – 1967 |
| Nuclear Engineering Correspondence      | 1968 – 1969 |
| Waste Disposal Receipts                 | 1970        |
| Waste                                   | 1971 – 1972 |
| Waste Records                           | 1972 – 1974 |
| Radioactive Shipment Records            | 1973 – 1975 |
| Radioactive Shipment Records            | 1978 – 1979 |
| Outgoing Radioactive Material Shipments | 1973 – 1977 |
| Shipping Records                        | 1977 – 1983 |
| Waste Disposal Costs                    | 1980 – 1981 |
| Waste Shipments                         | 1983 – 1986 |

From 1994 to the present, we have brokered our radioactive waste via Bionomics, Inc. After 1994, radioactive waste was only sent to licensed radioactive waste facilities.

Based on a review of waste disposal records, waste manifests, shipment documents, license records, conversations with current staff members, waste brokers and former staff members, we can find no evidence that Vanderbilt ever transported and/or brokered hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium. Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site.

We did not find any record of possession, use, survey, or transfer that could corroborate the ledger entry provided by the EPA.

Please note that the 1959 ledger entry provided to us predates the existence of Vanderbilt's Radiation Safety Department. As you're also aware, this paperwork predates Department of

Transportation shipping record requirements and, we believe, that no shipping documents for shipment of this specific item ever existed.

3. N/A as we did not respond with a yes to Question 2.

4. *Did Vanderbilt ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?*

Based on a review of waste disposal records, waste manifests, shipment documents, license records, conversations with current staff members, waste brokers and former staff members, we can find no evidence that Vanderbilt ever generated radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site.

5. N/A as we did not respond with a yes to Question 4.

6. *If you have reason to believe there may be persons able to provide more detailed or complete responses to any questions contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current address and telephone numbers of such persons as well as additional information they may have.*

Based on conversations with current staff members and former staff members we do not believe that that may be persons who are able to provide more detailed or complete responses to any of the questions, or who may be able to provide additional responsive documents.

7. *For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current address and telephone numbers of the persons from whom such information or documents may be obtained.*

The Vanderbilt Environmental Health and Safety office does not store documents with other individuals or organizations. We believe that any documents we have are in our possession, custody or control. Accordingly, we do not have names, titles, areas of responsibility, current address and telephone numbers of the persons from whom such information or documents may be obtained.

8. *If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the*

*generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.*

We have no other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site.

9. *If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:*

- a. Your document retention policy*
- b. A description of the type of information that would have been contained in the documents.*
- c. A description of the type of information that would have been contained in the documents.*
- d. The name, job title, and most current address known by you of the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.*

Based on a review of waste disposal records, waste manifests, shipment documents, and license records, we can find no evidence that Vanderbilt ever sent any material to the Site. The records examined bracket the time period shown on the ledger entry provided with the EPA letter.